

# BAKER & DANIELS

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## VIA ECF and FACSIMILE

May 9, 2011

The Honorable Madeline C. Arleo  
United States Magistrate Judge  
U.S. District Court for the District of New Jersey  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: *In Re: Zimmer Durom Hip Cup Products Liability Litigation*; MDL No. 2158  
Plaintiff Fact Sheet and Defendant Fact Sheet

Dear Judge Arleo:

As you know, we represent the defendants, Zimmer, Inc., *et al.*, and write on behalf of, and in agreement with, Plaintiffs' Liaison Counsel. Pursuant to paragraph 4 of the Initial Scheduling Order [Dct. 50], the parties were ordered to meet and confer about a proposed Plaintiff Fact Sheet and Defendant Fact Sheet, and submit any disputes over the fact sheets to Your Honor today, May 9, 2011. The parties have so conferred and are very close to reaching agreement on the fact sheets. However, there are a few outstanding issues that the parties hope to resolve tomorrow, May 10, 2011. Should the parties be unable to resolve the outstanding disputes, they will submit them to Your Honor by the close of business tomorrow.

Respectfully submitted,

/s/ Andrew L. Campbell